

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DARLENE OLIVER,

Plaintiff,

-against-

THE CITY OF NEW YORK; POLICE OFFICER MIGUEL PEREA;  
POLICE SERGEANT AMANDA SZOT; POLICE OFFICER DANIEL  
RANGEL; POLICE SERGEANT JOSE MARTINEZ; POLICE OFFICER  
CHRISTIAN VALENCIA; POLICE OFFICER ABUL MIAH; JOHN DOE  
FEMALE NYPD SERGEANT; JOHN DOE #1; JOHN DOE #2; FEMALE  
JOHN DOE OFFICER; JOHN DOE SERGEANT; JOHN DOE #3, JOHN  
DOES; RICHARD ROES,

Defendants.

**STIPULATION AND  
ORDER OF PARTIAL  
DISMISSAL PURSUANT TO  
FED. R. CIV. P. 41(a)(1)(A)(ii)**

19-cv-02321 (MKV) (KHP)

**WHEREAS**, plaintiff commenced this action by filing a complaint on or about March 14, 2019,  
alleging that the defendants violated plaintiff's federal civil and state common law rights; and

**WHEREAS**, plaintiff seeks to voluntarily dismiss all claims against defendants Miguel Perea,  
Amanda Szot, Daniel Rangel, Jose Martinez, Christian Valencia, and Abul Miah with prejudice; and

**WHEREAS**, plaintiff has authorized his counsel to agree to the terms set forth below;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the  
undersigned, as follows:

1. The above-referenced action is hereby dismissed with prejudice, as against defendants Miguel Perea, Amanda Szot, Daniel Rangel, Jose Martinez, Christian Valencia, and Abul Miah;
2. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, any and all of the claims that were asserted or could have been asserted by or on behalf of plaintiff Darlene Oliver against defendants Miguel Perea, Amanda Szot, Daniel Rangel, Jose Martinez, Christian Valencia, and Abul Miah, including their successors and assigns, arising out of the facts and circumstances that are the subject of this action, are hereby dismissed and discontinued, with prejudice, and without attorney's fees, costs, or disbursements to any party as against the other;

3. This Stipulation contains all the terms and conditions agreed upon by counsel for defendants and counsels for plaintiff hereto, and no oral agreement entered into at any time nor any written agreement entered into prior to the execution of this Stipulation shall be deemed to exist, or to bind the parties hereto, or to vary the terms and conditions contained herein; and

4. This Stipulation shall be binding upon the parties immediately upon signature and shall be submitted to the Court for entry as an Order.

Dated: New York, New York  
\_\_\_\_\_, 2023

LAW OFFICE OF JEFFREY A. ROTHMAN  
*Attorney for Plaintiff*  
305 Broadway, Suite 100  
New York, NY 10007  
(212) 227-2980

By:  2/6/23

Jeffrey A. Rothman, Esq.

HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel of the  
City of New York  
*Attorney for Defendants City of New York, Miguel  
Perea, Amanda Szot, Daniel Rangel, Jose  
Martinez, Christian Valencia, and Abul Miah*  
100 Church Street  
New York, New York 10007

By:  2/13/23

~~Hannah V. Faddis~~  
Senior Counsel

Joseph Zangrilli

SO ORDERED:

\_\_\_\_\_  
HON. MARY KAY VYSKOCIL  
UNITED STATES DISTRICT JUDGE

Dated: \_\_\_\_\_, 2023